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September 30, 1992

HOWARD J. BRAUN  
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OFFICE OF THE SECRETARY

Donna R. Searcy, Secretary  
Federal Communications Commission  
Washington, D.C. 20554

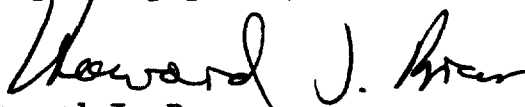
Re: MM Docket No. 92-155  
FM Table of Allotments

Dear Ms. Searcy:

Enclosed herewith, on behalf of Sunrise Broadcasting of Nebraska, Inc., licensee of Station KBWH(FM), Blair, Nebraska, are an original and four (4) copies of its "REPLY COMMENTS OF SUNRISE BROADCASTING OF NEBRASKA, INC." in the above-referenced proceeding.

Please direct all inquiries and communications concerning this matter to the undersigned.

Very truly yours,

  
Howard J. Braun

Enc.

cc: As on Certificate of Service (all w/enc.)

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FEDERAL COMMUNICATIONS COMMISSION  
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SEP 30 1992

FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

In the Matter of )  
 )  
Amendment of Section 73.202(b), )  
Table of Allotments, )  
FM Broadcast Stations )  
(Blair, Nebraska; Storm Lake, )  
Perry, and Sac City, Iowa) )

MM Docket No. 92-155  
RM-8020

To: Chief, Allocations Branch  
Policy and Rules Division  
Mass Media Bureau

REPLY COMMENTS OF SUNRISE BROADCASTING OF NEBRASKA, INC.

SUNRISE BROADCASTING OF NEBRASKA, INC. ("Sunrise"), licensee of Station KBWH(FM), Blair, Nebraska, by its attorneys, pursuant to §1.415(d) of the Commission's Rules, hereby submits its Reply Comments in response to: (A) the September 11, 1992 "Comments" of Blair Communications ("BC"); (B) the September 14, 1992 "Comments" of Perry Broadcasting Company ("Perry"); (C) the September 15, 1992 "Counter-Proposal and Comments" of Marjorie K. Mahn and Theodore H. Mahn (the "Mahn Partnership"); and (D) the September 15, 1992 "Counterproposal and Request for Order to Show Cause" of Ames Broadcasting Company ("Ames") in this proceeding. In support hereof, Sunrise shows the following:

1. The subject rulemaking proceeding was initiated by Notice of Proposed Rule Making and Order to Show Cause ("NPRM"), 7 FCC Rcd 4590 (MMB 1992), which fully adopted Sunrise's Petition for Rulemaking ("Petition") (RM-8020), requesting, inter alia, that the FM Table of Allotments be amended to substitute Channel 268C3 for Channel 292A at Blair,

Nebraska, and that the license of Station KBWH(FM) be modified to specify operation on that channel, except that the NPRM proposed to substitute Channel 248A, instead of Channel 265A, for Channel 286A at Sac City, Iowa.

2. As Sunrise will now demonstrate, none of the comments and counterproposals which responded to the NPRM is inconsistent with Sunrise's proposed upgrade to Channel 268C3 at Blair. Moreover, the attached Engineering Statement by Clarence M. Beverage of Communications Technologies, Inc. ("Engineering Statement") concludes (at 3) (emphasis added) that "a global solution is available whereby all petitioners can achieve their desired upgrades or new allocations". More specifically:

A) BC proposes to apply for a Class C3 frequency at Blair, and the NPRM (at ¶3) noted the availability of additional Channel 247C3 for that purpose (recommended in Sunrise's Petition). See Engineering Statement (at 2 and Table IX);

B) Perry accedes to the NPRM's proposed reallocation of its facilities to Channel 286A at its present site, and the Engineering Statement concludes (at 2 and Table III) that Channel 288A (counterproposed by Ames -- see infra) at the site coordinates proposed by Perry is acceptable in engineering terms;<sup>1</sup>

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<sup>1</sup> Sunrise presumes that Perry will have no non-engineering objection to reallocation to Channel 288A instead of 286A.

C) The Mahn Partnership's proposed allotment of Channel 248A at Alta, Iowa and of Channel 284A at Sac City (instead of Channel 248A, which was proposed in the NPRM) is acceptable in engineering terms and because the present Sac City allotment is vacant. See Engineering Statement (at 2 and Tables IV and V); and

D) The Ames counterproposal to substitute Channel 286C3 for Channel 296A at Ames, Iowa, allot Channel 296C3 at Lake City, Iowa, substitute Channel 288A for Channel 269A at Perry, Iowa, and substitute Channel 256A for Channel 296A at Denison, Iowa is acceptable in engineering terms. See Engineering Statement (at 2 and Tables III, VI, VII, and VIII).

3. Hence, Sunrise recommends and fully supports the following "global solution," derived from the NPRM and the comments and counterproposals herein, which permits grant of all of the new channel allotments and channel upgrades which the parties to this proceeding have proposed:

#### SUNRISE'S GLOBAL SOLUTION

| City             | Present | Proposed                     |
|------------------|---------|------------------------------|
| Blair, Nebraska  | 292A    | 247C3, 268C3                 |
| Perry, Iowa      | 269A    | 288A                         |
| Sac City, Iowa   | 286A    | 284A                         |
| Storm Lake, Iowa | 268C1   | 269C1                        |
| Alta, Iowa       | -       | 248A                         |
| Denison, Iowa    | 296A    | 256A (or 256C3) <sup>2</sup> |
| Ames, Iowa       | 296A    | 286C3                        |
| Lake City, Iowa  | -       | 296C3                        |

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<sup>2</sup> See Engineering Statement (at 2 and Table VIII-B).

WHEREFORE, in view of the foregoing, Sunrise respectfully requests that the Commission should amend the FM Table of Allotments and modify the licenses of the affected stations as described in Paragraph 3, supra.

Respectfully submitted,

SUNRISE BROADCASTING OF  
NEBRASKA, INC.

By

  
Howard J. Braun  
Jerold L. Jacobs

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Suite 200  
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(202) 463-7177

Its Attorneys

Dated: September 30, 1992

**ENGINEERING STATEMENT**  
**IN SUPPORT OF REPLY COMMENTS**  
**BY SUNRISE BROADCASTING OF NEBRASKA, INC.**  
**AMENDMENT TO *SECTION 73.202(B)* OF THE FCC RULES**  
**TO**  
**ADD CHANNEL 268C3, DELETE CHANNEL 292A**  
**AT**  
**BLAIR, NEBRASKA**  
**MM DOCKET NO. 92-155**

**SEPTEMBER 1992**

**ENGINEERING STATEMENT  
IN SUPPORT OF REPLY COMMENTS  
BY SUNRISE BROADCASTING OF NEBRASKA, INC.  
AMENDMENT TO *SECTION 73.202(B)* OF THE FCC RULES  
TO  
ADD CHANNEL 268C3, DELETE CHANNEL 292A  
AT  
BLAIR, NEBRASKA  
MM DOCKET NO. 92-155**

**SEPTEMBER 1992**

**SUMMARY**

The following engineering statement has been prepared on behalf of Sunrise Broadcasting of Nebraska, Inc., licensee of FM station KBWH, Channel 292A, Blair, Nebraska. Sunrise has filed a Petition for Rule Making to upgrade KBWH to Channel 268C3. The Sunrise Proposed Rule Making was assigned Docket No. 92-155 and included the following proposed changes to the Table of Allotments:

| <b><u>CITY</u></b>      | <b><u>PRESENT</u></b> | <b><u>PROPOSED</u></b> |
|-------------------------|-----------------------|------------------------|
| Blair, NE - KBWH        | 292A                  | 268C3                  |
| Perry, Iowa - KDLS      | 269A                  | 286A                   |
| Sac City, Iowa - Vacant | 286A                  | 248A                   |
| Storm Lake, Iowa - KAYL | 268C1                 | 269C1                  |

Several Counterproposals were filed in the comment period as follows:

**THE MAHN PARTNERSHIP**

| <b><u>CITY</u></b>      | <b><u>PRESENT</u></b> | <b><u>PROPOSED</u></b> |
|-------------------------|-----------------------|------------------------|
| Alta, Iowa - New        | ---                   | 248A                   |
| Sac City, Iowa - Vacant | 286A                  | 265A or 284A           |

### AMES BROADCASTING COMPANY

| <u>CITY</u>           | <u>PRESENT</u> | <u>PROPOSED</u> |
|-----------------------|----------------|-----------------|
| Ames, Iowa - KCCQ     | 296A           | 286C3           |
| Lake City, Iowa - New | ---            | 296C3           |
| Perry, Iowa - KDLS    | 269A           | 288A            |
| Denison, Iowa - KDSN  | 296A           | 256A            |

### BLAIR COMMUNICATIONS

| <u>CITY</u>     | <u>PRESENT</u> | <u>PROPOSED</u> |
|-----------------|----------------|-----------------|
| Blair, NE - New | ---            | 247C3           |

#### LACK OF MUTUAL EXCLUSIVITY

None of the counterproposals is mutually exclusive with the Sunrise proposal to add Channel 268C3 at Blair, Nebraska. The Mahn proposal and the Ames proposal are not mutually exclusive with each other. Allocation studies are attached, Tables 1 - 9, demonstrating the lack of mutual exclusivity for the following Amendments to the Table of Allotments:

| <u>TABLE</u> | <u>CITY</u>      | <u>PRESENT</u> | <u>PROPOSED</u> |
|--------------|------------------|----------------|-----------------|
| I            | Blair, Nebraska  | 292A           | 268C3           |
| II           | Storm Lake, Iowa | 268C1          | 269C1           |
| III          | Perry, Iowa      | 269A           | 288A            |
| IV           | Alta, Iowa       | ---            | 248A            |
| V            | Sac City, Iowa   | 286A           | 284A            |
| VI           | Ames, Iowa       | 296A           | 286C3           |
| VII          | Lake City, Iowa  | ---            | 296C3           |
| VIII         | Denison, Iowa    | 296A           | 256A or 256C3   |
| IX           | Blair, Nebraska  | ---            | 247C3           |

Table VIII-B is an allocation study for Channel 256C3 demonstrating that KDSN can upgrade to Class C3 at a location less than 12 km from its licensed site should KDSN decide to do so.



**CONCLUSION**

The previous allocation studies demonstrate that a global solution is available whereby all petitioners can achieve the desired upgrades or new allocations.


The foregoing was prepared on behalf of **Sunrise Broadcasting of Nebraska, Inc.** by, Clarence M. Beverage of *Communications Technologies, Inc.*, Marlton, New Jersey, whose qualifications are a matter of record with the Federal Communications Commission. The statements herein are true and correct of his own knowledge, except such statements made on information and belief, and as to these statements he believes them to be true and correct.

By 

**Clarence M. Beverage**  
for Communications Technologies, Inc.  
Marlton, New Jersey

**SUBSCRIBED AND SWORN TO** before me

this 23 rd day of September, 1992,

 , NOTARY PUBLIC

**KATHLEEN A. STEVENS**  
NOTARY PUBLIC OF NEW JERSEY  
MY COMMISSION EXPIRES MARCH 28, 1993

T A B L E I  
ALLOCATION STUDY  
DELETE CHANNEL 292A, ADD CHANNEL 268C3  
BLAIR, NEBRASKA

SEPTEMBER 1992

Search of Channel 268C3 (101.5 MHz), at N. 41 38 52, W. 96 17 55.

| CALL   | CITY       | ST | CHN | CL | S | DIST  | SEPN  | BRNG   | CLEARANCE          |
|--------|------------|----|-----|----|---|-------|-------|--------|--------------------|
| KVNO   | Omaha      | NE | 214 | C3 | L | 43.9  | 14.0  | 148.9° | 29.9               |
| ALC    | Columbus   | NE | 266 | C1 | U | 101.2 | 76.0  | 246.3° | 25.2               |
| KLIR   | Columbus   | NE | 266 | C1 | L | 101.2 | 76.0  | 246.3° | 25.2               |
| ALC    | Creston    | IA | 267 | C3 | U | 172.2 | 99.0  | 110.9° | 73.2               |
| KITR   | Creston    | IA | 267 | C3 | L | 172.2 | 99.0  | 110.9° | 73.2               |
| ALC    | Hastings   | NE | 268 | C  | V | 242.0 | 237.0 | 243.0° | 5.0                |
| KAYLFM | Storm Lake | IA | 268 | C1 | C | 144.0 | 211.0 | 40.4°  | -67.0 <sup>1</sup> |
| KEZH   | Hastings   | NE | 268 | C  | A | 242.0 | 237.0 | 243.0° | 5.0                |
| KAYLFM | Storm Lake | IA | 268 | C1 | L | 144.0 | 211.0 | 40.6°  | -67.0              |
| KEZH   | Hastings   | NE | 268 | C2 | L | 210.9 | 177.0 | 235.4° | 33.9               |
| ALC    | Storm Lake | IA | 268 | C1 | U | 144.0 | 211.0 | 40.6°  | -67.0              |
| KAYLFM | Storm Lake | IA | 268 | C1 | D | 144.0 | 211.0 | 40.4°  | -67.0              |
| KBWH   | Blair      | NE | 268 | C3 | A | 0.0   | 153.0 | 0.0°   | -153.0             |
| KAYLFM | Storm Lake | IA | 269 | C1 | A | 144.0 | 144.0 | 40.4°  | -0.0               |
| KFMQFM | Lincoln    | NE | 270 | C  | L | 96.0  | 96.0  | 184.3° | -0.0               |
| ALC    | Lincoln    | NE | 270 | C  | U | 96.0  | 96.0  | 184.3° | -0.0               |

<sup>1</sup> Channel 269C1 proposed, See Table II.

T A B L E   I I

ALLOCATION STUDY  
DELETE CHANNEL 268C1, ADD CHANNEL 269C1  
STORM LAKE, IOWA

SEPTEMBER 1992

Searching of Channel 269C1 (101.7 MHz), N. 42 38 5, W. 95 10 10.

| CALL   | CITY        | ST | CHN | CL | S | DIST  | SEPN  | BRNG   | CLEARANCE           |
|--------|-------------|----|-----|----|---|-------|-------|--------|---------------------|
| KTPR   | Fort Dodge  | IA | 216 | C  | L | 65.3  | 41.0  | 71.9°  | 24.3                |
| ALC    | Luverne     | MN | 266 | C  | U | 155.0 | 105.0 | 327.1° | 50.0                |
| KLQL   | Luverne     | MN | 266 | C1 | L | 155.0 | 82.0  | 327.1° | 73.0                |
| KLQL   | Luverne     | MN | 266 | C  | C | 155.0 | 105.0 | 327.1° | 50.0                |
| KAYLFM | Storm Lake  | IA | 268 | C1 | C | 0.0   | 177.0 | 0.0°   | -177.0 <sup>1</sup> |
| KAYLFM | Storm Lake  | IA | 268 | C1 | L | 0.5   | 177.0 | 127.3° | -176.5              |
| ALC    | Storm Lake  | IA | 268 | C1 | U | 0.5   | 177.0 | 127.3° | -176.5              |
| KAYLFM | Storm Lake  | IA | 268 | C1 | D | 0.0   | 177.0 | 0.0°   | -177.0              |
| KBWH   | Blair       | NE | 268 | C3 | A | 144.0 | 144.0 | 220.4° | -0.0                |
| KAYLFM | Storm Lake  | IA | 269 | C1 | A | 0.0   | 245.0 | 0.0°   | -245.0              |
| ALC    | Albany      | MO | 269 | C2 | A | 274.9 | 224.0 | 164.3° | 50.9                |
| ALC    | Olivia      | MN | 269 | A  | U | 237.3 | 200.0 | 4.7°   | 37.3                |
| ALC    | Perry       | IA | 269 | A  | V | 129.1 | 200.0 | 133.6° | -70.9 <sup>2</sup>  |
| KDLSFM | Perry       | IA | 269 | A  | A | 129.0 | 200.0 | 133.6° | -71.0               |
| KDLSFM | Perry       | IA | 269 | A  | D | 129.1 | 200.0 | 133.6° | -70.9               |
| KRCH   | Rochester   | MN | 269 | C2 | L | 259.7 | 224.0 | 50.7°  | 35.7                |
| KDLSFM | Perry       | IA | 269 | A  | A | 129.1 | 200.0 | 133.6° | -70.9               |
| KOLV   | Olivia      | MN | 269 | A  | L | 237.3 | 200.0 | 4.7°   | 37.3                |
| ALC    | Rochester   | MN | 269 | C2 | U | 277.6 | 224.0 | 55.7°  | 53.6                |
| KNWSFM | Waterloo    | IA | 270 | C  | L | 261.0 | 209.0 | 95.4°  | 52.0                |
| KFMQFM | Lincoln     | NE | 270 | C  | L | 228.9 | 209.0 | 206.2° | 19.9                |
| ALC    | Sioux Falls | SD | 270 | C2 | U | 185.5 | 158.0 | 312.2° | 27.5                |
| ALC    | Waterloo    | IA | 270 | C  | U | 261.0 | 209.0 | 95.4°  | 52.0                |
| ALC    | Lincoln     | NE | 270 | C  | U | 228.9 | 209.0 | 206.2° | 19.9                |
| KTWB   | Sioux Falls | SD | 270 | C2 | C | 186.9 | 158.0 | 311.6° | 28.9                |
| NEW    | Milford     | IA | 271 | C2 | A | 79.4  | 79.0  | 357.5° | 0.4                 |
| ALC    | Milford     | IA | 271 | C2 | V | 78.7  | 79.0  | 2.5°   | -0.3                |
| NEW    | Milford     | IA | 271 | C2 | A | 82.6  | 79.0  | 359.0° | 3.6                 |
| NEW    | Milford     | IA | 271 | C2 | A | 85.1  | 79.0  | 355.3° | 6.1                 |
| ALC    | Onawa       | IA | 272 | C1 | V | 107.5 | 82.0  | 231.2° | 25.5                |
| ALC    | Forest City | IA | 272 | A  | U | 144.8 | 75.0  | 60.1°  | 69.8                |
| KIOW   | Forest City | IA | 272 | A  | L | 144.8 | 75.0  | 60.1°  | 69.8                |
| KOOO   | Onawa       | IA | 272 | A  | C | 107.5 | 75.0  | 231.2° | 32.5                |
| KIOW   | Forest City | IA | 272 | A  | A | 144.8 | 75.0  | 60.1°  | 69.8                |
| KOOO   | Onawa       | IA | 272 | C1 | A | 139.8 | 82.0  | 223.9° | 57.8                |

<sup>1</sup> Channel 268C1 to be deleted.

<sup>2</sup> Proposed Channel 288A, See Table III.

TABLE III  
ALLOCATION STUDY  
DELETE CHANNEL 269A, ADD CHANNEL 288A  
PERRY, IOWA

SEPTEMBER 1992

Search of channel 288A+ (105.5 MHz), at N. 41 50 3, W. 94 2 12. (4)

| CALL   | CITY       | ST | CHN | CL | S | DIST  | SEPN  | BRNG   | CLEARANCE          |
|--------|------------|----|-----|----|---|-------|-------|--------|--------------------|
| ALC    | Des Moines | IA | 235 | C  | U | 53.2  | 28.0  | 115.0° | 25.2               |
| KGGOFM | Des Moines | IA | 235 | C  | L | 53.2  | 28.0  | 115.0° | 25.2               |
| KDLSFM | Perry      | IA | 285 | A  | L | 0.2   | 31.0  | 204.2° | -30.8 <sup>1</sup> |
| KDLSFM | Perry      | IA | 286 | A  | A | 0.2   | 31.0  | 204.2° | -30.8              |
| ALC    | Harlan     | IA | 287 | C3 | U | 105.4 | 89.0  | 256.7° | 16.4               |
| KNOD   | Harlan     | IA | 287 | C3 | C | 105.4 | 89.0  | 256.7° | 16.4               |
| ALC    | Chariton   | IA | 287 | C2 | V | 110.4 | 106.0 | 145.6° | 4.4                |
| KELRFM | Chariton   | IA | 288 | A  | L | 110.4 | 115.0 | 145.6° | -4.6 <sup>2</sup>  |
| KNOD   | Harlan     | IA | 288 | A  | L | 105.4 | 115.0 | 256.7° | -9.6 <sup>3</sup>  |
| KOKZ   | Waterloo   | IA | 289 | C  | L | 173.5 | 165.0 | 68.4°  | 8.5                |
| ALC    | Waterloo   | IA | 289 | C  | U | 173.5 | 165.0 | 68.4°  | 8.5                |

- <sup>1</sup> Channel 285A to be deleted.
- <sup>2</sup> KELR ordered to Channel 287C2, MM Docket No. 89-264.
- <sup>3</sup> KNOD ordered to Channel 287C3, MM Docket No. 90-303.
- <sup>4</sup> Coordinates are those referenced by Perry Broadcasting Company in its comments.

TABLE IV  
ALLOCATION STUDY  
PROPOSED CHANNEL 248A  
ALTA, IOWA

SEPTEMBER 1992

Search of channel 248A+ (97.5 MHz), at N. 42 40 25, W. 95 17 25.

| CALL | CITY        | ST | CHN | CL | S | DIST  | SEPN  | BRNG   | CLEARANCE          |
|------|-------------|----|-----|----|---|-------|-------|--------|--------------------|
| ALC  | Clarion     | IA | 245 | C1 | U | 92.9  | 75.0  | 90.3°  | 17.9               |
| KRIT | Clarion     | IA | 245 | C1 | L | 93.2  | 75.0  | 90.1°  | 18.2               |
| KDMI | Des Moines  | IA | 247 | C1 | L | 169.3 | 133.0 | 131.5° | 36.3               |
| ALC  | Des Moines  | IA | 247 | C1 | U | 169.3 | 133.0 | 131.5° | 36.3               |
| ALC  | Sioux Falls | SD | 247 | C1 | U | 150.2 | 133.0 | 313.1° | 17.2               |
| KPAT | Sioux Falls | SD | 247 | C1 | L | 150.2 | 133.0 | 313.1° | 17.2               |
| ALC  | Sac City    | IA | 248 | A  | A | 36.6  | 115.0 | 140.2° | -78.4 <sup>1</sup> |
| KHBT | Humboldt    | IA | 249 | A  | L | 89.0  | 72.0  | 85.8°  | 17.0               |
| ALC  | Humboldt    | IA | 249 | A  | U | 89.0  | 72.0  | 85.8°  | 17.0               |
| ALC  | Sioux City  | IA | 250 | C1 | U | 82.3  | 75.0  | 255.0° | 7.3                |
| KSEZ | Sioux City  | IA | 250 | C1 | L | 82.3  | 75.0  | 255.0° | 7.3                |

<sup>1</sup> Proposed for Channel 284A, See Table V

T A B L E V

ALLOCATION STUDY  
DELETE CHANNEL 286A, ADD CHANNEL 284A  
SAC CITY, IOWA

SEPTEMBER 1992

Search of channel 284A+ (104.7 MHz), at N. 42 29 50, W. 94 50 41.

| CALL   | CITY        | ST | CHN | CL | S | DIST  | SEPN  | BRNG   | CLEARANCE            |
|--------|-------------|----|-----|----|---|-------|-------|--------|----------------------|
| ALC    | Ames        | IA | 281 | C  | U | 102.0 | 95.0  | 130.4° | 7.0                  |
| KEZT   | Ames        | IA | 281 | C  | L | 102.0 | 95.0  | 130.4° | 7.0                  |
| KESYFM | Omaha       | NE | 283 | C  | L | 164.6 | 165.0 | 216.6° | -0.4                 |
| KJLY   | Blue Earth  | MN | 283 | C2 | L | 142.5 | 106.0 | 24.9°  | 36.5                 |
| ALC    | Omaha       | NE | 283 | C  | U | 164.6 | 165.0 | 216.6° | -0.4                 |
| ALC    | Blue Earth  | MN | 283 | C2 | U | 142.5 | 106.0 | 24.9°  | 36.5                 |
| ALC    | Sioux Falls | SD | 284 | C  | U | 228.0 | 226.0 | 306.9° | 2.0                  |
| KKLSFM | Sioux Falls | SD | 284 | C  | C | 228.0 | 226.0 | 306.9° | 2.0                  |
| KKLSFM | Sioux Falls | SD | 284 | C1 | L | 228.0 | 200.0 | 306.9° | 28.0                 |
| ALC    | Spencer     | IA | 285 | A  | U | 75.8  | 72.0  | 345.2° | 3.8                  |
| KDLSFM | Perry       | IA | 285 | A  | L | 99.5  | 72.0  | 137.9° | 27.5                 |
| KJJG   | Spencer     | IA | 285 | A  | L | 75.8  | 72.0  | 345.2° | 3.8                  |
| ALC    | Sac City    | IA | 286 | A  | D | 15.7  | 31.0  | 237.0° | -15.3 <sup>1,2</sup> |
| ALC    | Sac City    | IA | 286 | A  | V | 15.7  | 31.0  | 237.0° | -15.3                |

<sup>1</sup> Channel 286A to be deleted.

<sup>2</sup> Allocation coordinates are U.S. Atlas Reference Coordinates.

TABLE VI  
ALLOCATION STUDY  
DELETE CHANNEL 269A, ADD CHANNEL 286C3  
AMES, IOWA

SEPTEMBER 1992

Search of channel 286C3 (105.1 MHz), at N. 42 4 5, W. 93 38 13.

| CALL   | CITY             | ST | CHN | CL | S | DIST  | SEPN  | BRNG   | CLEARANCE          |
|--------|------------------|----|-----|----|---|-------|-------|--------|--------------------|
| KKEZ   | Fort Dodge       | IA | 233 | C1 | L | 66.9  | 24.0  | 315.2° | 42.9               |
| ALC    | Fort Dodge       | IA | 233 | C1 | U | 66.9  | 24.0  | 315.2° | 42.9               |
| ALC    | Oskaloosa        | IA | 285 | C2 | U | 117.0 | 117.0 | 135.2° | 0.0                |
| ALC    | Hampton          | IA | 285 | A  | U | 92.3  | 89.0  | 23.7°  | 3.3                |
| KWGG   | Hampton          | IA | 285 | A  | L | 92.3  | 89.0  | 23.7°  | 3.3                |
| KBOEFM | Oskaloosa        | IA | 285 | A  | L | 117.0 | 89.0  | 135.2° | 28.0               |
| KDLSFM | Perry            | IA | 285 | A  | L | 42.3  | 89.0  | 231.8° | -46.7 <sup>1</sup> |
| KBOEFM | Oskaloosa        | IA | 285 | C2 | C | 117.0 | 117.0 | 135.2° | 0.0                |
| KBOEFM | Oskaloosa        | IA | 285 | C2 | C | 117.0 | 117.0 | 135.2° | 0.0                |
| ALC    | Sac City         | IA | 286 | A  | D | 119.5 | 142.0 | 289.1° | -22.5 <sup>2</sup> |
| ALC    | Sac City         | IA | 286 | A  | V | 119.5 | 142.0 | 289.1° | -22.5              |
| KKJO   | St. Joseph       | MO | 286 | C1 | L | 282.0 | 211.0 | 200.0° | 71.0               |
| KKJO   | St. Joseph       | MO | 286 | C  | C | 289.9 | 237.0 | 195.5° | 52.9               |
| ALC    | St. Joseph       | MO | 286 | C  | U | 282.0 | 237.0 | 200.0° | 45.0               |
| ALC    | Spring Valley    | MN | 286 | A  | A | 206.6 | 142.0 | 29.5°  | 64.6               |
| KDLSFM | Perry            | IA | 286 | A  | A | 42.3  | 142.0 | 231.8° | -99.7 <sup>1</sup> |
| KYBA   | Stewartville     | MN | 287 | C2 | C | 194.1 | 117.0 | 23.3°  | 77.1               |
| ALC    | Harlan           | IA | 287 | C3 | U | 144.5 | 99.0  | 249.7° | 45.5               |
| KNOD   | Harlan           | IA | 287 | C3 | C | 144.5 | 99.0  | 249.7° | 45.5               |
| ALC    | Chariton         | IA | 287 | C2 | V | 120.6 | 117.0 | 166.1° | 3.6                |
| KELRFM | Chariton         | IA | 288 | A  | L | 120.6 | 42.0  | 166.1° | 78.6               |
| K288DX | Des Moines, etc. | IA | 288 | D  | L | 53.4  | 0.0   | 179.0° | 53.4               |
| K288CI | Gilbert          | IA | 288 | D  | L | 5.8   | 0.0   | 357.5° | 5.8                |
| KOKZ   | Waterloo         | IA | 289 | C  | L | 133.5 | 96.0  | 73.5°  | 37.5               |
| ALC    | Waterloo         | IA | 289 | C  | U | 133.5 | 96.0  | 73.5°  | 37.5               |

<sup>1</sup> Proposed Channel 288A, See Table III.

<sup>2</sup> Proposed Channel 284A, See Table V.

TABLE VII  
ALLOCATION STUDY  
PROPOSED CHANNEL 296C3  
LAKE CITY, IOWA

SEPTEMBER 1992

Search of channel 296C3 (107.1 MHz), at N. 42 16 3, W. 94 44 1.

| CALL   | CITY             | ST | CHN | CL | S | DIST  | SEPN  | BRNG   | CLEARANCE          |
|--------|------------------|----|-----|----|---|-------|-------|--------|--------------------|
| ALC    | Audubon          | IA | 294 | C3 | A | 54.4  | 43.0  | 188.7° | 11.4               |
| ALC    | Audubon          | IA | 294 | A  | A | 63.0  | 42.0  | 194.6° | 21.0               |
| KJJC   | Osceola          | IA | 295 | C2 | L | 155.8 | 117.0 | 152.2° | 38.8               |
| KCCQ   | Ames             | IA | 296 | A  | L | 90.0  | 142.0 | 106.5° | -52.0 <sup>1</sup> |
| KDSNFM | Denison          | IA | 296 | A  | L | 55.6  | 142.0 | 242.5° | -86.4 <sup>2</sup> |
| ALC    | South Sioux City | NE | 296 | A  | V | 142.2 | 142.0 | 280.5° | 0.2                |
| ALC    | Ames             | IA | 296 | A  | U | 90.0  | 142.0 | 106.5° | -52.0 <sup>1</sup> |
| ALC    | Denison          | IA | 296 | A  | U | 55.6  | 142.0 | 242.5° | -86.4 <sup>2</sup> |
| ALC    | Forest City      | IA | 297 | C2 | U | 129.3 | 117.0 | 46.0°  | 12.3               |
| KIOW   | Forest City      | IA | 297 | C2 | C | 132.6 | 117.0 | 47.7°  | 15.6               |
| KICDFM | Spencer          | IA | 299 | C1 | L | 105.4 | 76.0  | 341.3° | 29.4               |
| ALC    | Spencer          | IA | 299 | C1 | U | 105.4 | 76.0  | 341.3° | 29.4               |

<sup>1</sup> Proposed Channel 286C3, See Table VI.

<sup>2</sup> Proposed Channel 256A, See Table VIII.



T A B L E   V I I I  
 A L L O C A T I O N   S T U D Y  
 P R O P O S E D   C H A N N E L   2 5 6 A  
 D E N I S O N ,   A L

S E P T E M B E R   1 9 9 2

Search of channel 256A+ (99.1 MHz), at N. 42 2 11, W. 95 19 50.

| CALL   | CITY           | ST | CHN | CL | S | DIST  | SEPN  | BRNG   | CLEARANCE |
|--------|----------------|----|-----|----|---|-------|-------|--------|-----------|
| KQKQFM | Council Bluffs | IA | 253 | C  | L | 99.6  | 95.0  | 215.6° | 4.6       |
| ALC    | Council Bluffs | IA | 253 | C  | U | 96.7  | 95.0  | 207.2° | 1.7       |
| ALC    | Jefferson      | IA | 255 | A  | U | 78.5  | 72.0  | 91.5°  | 6.5       |
| KLSN   | Jefferson      | IA | 255 | A  | L | 79.2  | 72.0  | 91.6°  | 7.2       |
| KEEZFM | Mankato        | MN | 256 | C1 | L | 224.0 | 200.0 | 19.5°  | 24.0      |
| ALC    | Mankato        | MN | 256 | C1 | U | 224.0 | 200.0 | 19.5°  | 24.0      |
| KKMA   | Le Mars        | IA | 258 | C1 | L | 91.2  | 75.0  | 302.9° | 16.2      |
| ALC    | Le Mars        | IA | 258 | C1 | U | 91.2  | 75.0  | 302.9° | 16.2      |

# T A B L E    V I I I   -   B

## ALLOCATION STUDY DELETE CHANNEL 296A, ADD CHANNEL 256C3 DENISON, IOWA

SEPTEMBER 1992

Search of channel 256C3 (99.1 MHz), at N. 42 4 37, W. 95 27 34.

| CALL   | CITY           | ST | CHN | CL | S | DIST  | SEPN  | BRNG   | CLEARANCE |
|--------|----------------|----|-----|----|---|-------|-------|--------|-----------|
| KQKQFM | Council Bluffs | IA | 253 | C  | L | 97.7  | 96.0  | 208.9° | 1.7       |
| ALC    | Council Bluffs | IA | 253 | C  | U | 96.5  | 96.0  | 200.3° | 0.5       |
| ALC    | Jefferson      | IA | 255 | A  | U | 89.4  | 89.0  | 94.2°  | 0.4       |
| KLSN   | Jefferson      | IA | 255 | A  | L | 90.1  | 89.0  | 94.3°  | 1.1       |
| KEEZFM | Mankato        | MN | 256 | C1 | L | 223.6 | 211.0 | 22.5°  | 12.6      |
| ALC    | Mankato        | MN | 256 | C1 | U | 223.6 | 211.0 | 22.5°  | 12.6      |
| KKMA   | Le Mars        | IA | 258 | C1 | L | 79.8  | 76.0  | 304.3° | 3.8       |
| ALC    | Le Mars        | IA | 258 | C1 | U | 79.8  | 76.0  | 304.3° | 3.8       |

T A B L E   I X  
 ALLOCATION STUDY  
 PROPOSED CHANNEL 247C3  
 BLAIR, NEBRASKA

SEPTEMBER 1992

Search of channel 247C3 (97.3 MHz), at N. 41 42 43, W. 96 17 20.

| CALL   | CITY          | ST | CHN | CL | S | DIST  | SEPN  | BRNG   | CLEARANCE         |
|--------|---------------|----|-----|----|---|-------|-------|--------|-------------------|
| ALC    | Seward        | NE | 245 | C1 | U | 79.6  | 76.0  | 214.9° | 3.6               |
| KZKX   | Seward        | NE | 245 | C1 | L | 79.6  | 76.0  | 214.9° | 3.6               |
| ALC    | Blair         | NE | 247 | C3 | A | 0.7   | 153.0 | 183.7° | -152.3            |
| KDMI   | Des Moines    | IA | 247 | C1 | L | 210.9 | 211.0 | 91.5°  | -0.0              |
| ALC    | Des Moines    | IA | 247 | C1 | U | 210.9 | 211.0 | 91.5°  | -0.0              |
| ALC    | Sioux Falls   | SD | 247 | C1 | U | 211.3 | 211.0 | 352.2° | 0.3               |
| ALC    | Aurora        | NE | 247 | C2 | U | 189.1 | 177.0 | 238.7° | 12.1              |
| KLRB   | Aurora        | NE | 247 | C2 | L | 177.2 | 177.0 | 238.5° | 0.2               |
| ALC    | Blair         | NE | 247 | C3 | A | 0.7   | 153.0 | 183.7° | -152.3            |
| KPAT   | Sioux Falls   | SD | 247 | C1 | L | 211.3 | 211.0 | 352.2° | 0.3               |
| ALC    | Nebraska City | NE | 249 | C1 | V | 92.0  | 76.0  | 180.1° | 16.0              |
| ALC    | Sioux City    | IA | 250 | C1 | U | 85.6  | 76.0  | 1.7°   | 9.6               |
| KSEZ   | Sioux City    | IA | 250 | C1 | L | 85.6  | 76.0  | 1.7°   | 9.6               |
| ALC    | West Point    | NE | 300 | C1 | V | 33.3  | 24.0  | 284.1° | 9.3               |
| KWPNFM | West Point    | NE | 300 | C1 | A | 19.3  | 24.0  | 250.6° | -4.7 <sup>1</sup> |
| KWPNFM | West Point    | NE | 300 | A  | L | 33.3  | 12.0  | 284.1° | 21.3              |

<sup>1</sup> Application short spaced to Channel 300A allocation at Stuart, Iowa.

**CERTIFICATE OF SERVICE**

I, Katherine D. Wright, a secretary in the law offices of Rosenman & Colin, do hereby certify that on this 30th day of September, 1992, I have caused to be mailed, or hand delivered, a copy of the foregoing **"REPLY COMMENTS OF SUNRISE BROADCASTING OF NEBRASKA, INC."** to the following:

Michael C. Ruger, Chief\*  
Allocations Branch  
Policy and Rules Division  
Mass Media Bureau  
Federal Communications Commission  
2025 M Street, N.W.  
Room 8322  
Washington, D.C. 20554

Ms. Leslie K. Shapiro  
Allocations Branch  
Policy and Rules Division  
Mass Media Bureau  
Federal Communications Commission  
2025 M Street, N.W.  
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Katherine D. Wright

**\*BY HAND**